

## REMARKS

Applicant respectfully requests reconsideration of this application as amended. Claims 27, 33, and 47 have been amended. No claims have been canceled. No claims have been added.

### Claim Rejections – 35 USC § 112

Claim 49 is rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicant respectfully submits that support for “the packet processor to cause one or more said lower level frames to be compressed at a remote location before generation of network packets” (Claim 49) is found in the specification at least where it is written: “packet processor 606 can transmit one to any number of the DS0s packet streams to a remote location for compression of such streams. Accordingly, the compression can be performed by processors...located in remote locations” (Specification, paragraph 0065, lines 6-9). Thus, Applicant respectfully submits that Claim 49 is supported by at least this portion of the specification.

### Claim Rejections – 35 USC § 102

Claim 21, 24-25, 33, and 36-37 are rejected under 35 U.S.C. § 102(e) as being anticipated by the admitted prior art. Applicant interprets the “admitted prior art” referred to by the Examiner as the “Background” section of the applicant’s Specification.

In the line card 100 of Figure 1, the “packet engine unit 104 locates the packet boundaries within the payload and forwards the packets to the packet processor 106” (Specification, paragraph [0005], lines 14-16). The line card 200 of Figure 2 does not use a packet engine unit or generate packet engine packets, but rather the interface unit 204 and DSP 206 “transmits...packet streams to the packet processor 208” (Specification, paragraph [0009], line

26). The “packet processor 106” in Figure 1 is a separate packet processor than the “packet processor 208” in Figure 2. As such, the admitted prior art requires two packet processors, uses an interface unit and a DSP, and does not use packet engine packets in line card 200. Thus, Applicant respectfully submits that the admitted prior art does not describe at least using the “same packet processor”(Claim 21, 33) for “generating network packets” from “packet engine packets” both from placing a “first TDM signal into first packet engine packets based on the frame boundaries” and placing a “second TDM signal into second packet engine packets, independent of frame boundaries” (Claim 21, 33). For at least these reasons, Claims 21 and 33 are not anticipated by the admitted prior art.

Applicant respectfully submits that dependent claims 24-25 and 36-37 are allowable for at least the reason that they depend on an independent allowable claim.

#### Claim Rejections – 35 USC § 103

Claims 1-4, 5-11, 12-15, 16-20, 22-23, 26-32, 34-40, 41-46, and 47-48, rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art in view of Chao (U.S. 4,893,306).

#### Claims 1-4, 5-11, 12-15, 16-20, 22-23, 26-32, 34-40, and 47-48

The Applicant respectfully submits that the combination does not describe or render obvious: 1) “a packet engine unit to receive the payload, the overhead data and the frame alignment data and to generate a number of packet engine packets” (Claims 1, 8); 2) “placing the TDM signal into packet engine packets...wherein the overhead data, the payload data and the frame alignment data are within packet engine packets” (Claim 16, 27); and 3) “a packet engine unit...to generate a packet engine packet that includes the payload, the frame alignment data, and the overhead data” (Claim 47).

First, the admitted prior art is not capable of forwarding from a deframer, each of the payload, overhead data, and frame alignment data to a packet engine unit. Rather, the deframer unit 102 of the line card 100 of Figure 1 merely forwards a “payload to the packet engine unit 104” (Specification, paragraph 0005, lines 6-11); whereas, the deframer unit 202 of the line card of Figure 2 “transmits the payload (the DSI data streams) along with the frame alignment data...to interface unit 204” (Specification, paragraph 0008, lines 17-19). Furthermore, the line card 200 in Figure 2 does not even include a packet engine unit. Thus, the admitted prior art does not forward from a deframer payload, overhead data, and the frame alignment data to a packet engine unit (Claims 1, 8) or place a TDM signal into packet engine packets where the overhead data, payload data, and the frame alignment data are within packet engine packets (Claims 16, 27, 47).

Second, the DTDM data transmission technique in Chao describes only that “the overhead field includes....a frame alignment word for frame timing” (Chao, col. 4, lines 52-53), but does not describe the use of payload, overhead data, and frame alignment data in a “TDM” signal to generate “packet engine packets” (Claims 1, 8, 16, 27, and 47). Furthermore, rather than generating packet engine packets, “diverse tributaries are multiplexed into a single DTDM bit stream” in Chao. (Chao, col. 7, lines 60-62). Thus, Chao merely multiplexes packet data and TDM data into a DTDM signal, and does not generate “packet engine packets” from “TDM” data as in the Applicant’s claims. As such, the combination would not work because payload, overhead data, and frame alignment data would never be used to generate packet engine packets if the references were combined. Therefore, Applicant respectfully submits that the combination does not describe or suggest Applicant’s independent Claims 1, 8, 16, 27, and 47.

Applicant respectfully submits that dependent claims 2-4, 5-7, 9-15, 17-20, 22-23, 26, 28-32, 34-40, and 48 are allowable for at least the reason that they depend on an independent allowable claim.

Claim 41-46

First, the admitted prior art is not capable of forwarding from a packet engine unit, “frames of the TDM signal and the frame alignment data” to a framer unit (Claim 41). Rather, the packet engine unit 110 of the line card 100 of Figure 1 merely “combines...packets into payloads of the protocol associated with the transmitting line coupled to framing unit 112” and “forwards these payloads to the framer unit 112” (Specification, paragraph 0005, lines 23-24); whereas the line card 200 in Figure 2 does not even include a packet engine unit. Thus, the packet engine unit in the admitted prior art does not forward “frames of the TDM signal and the frame alignment data” to framer unit “to reconstruct the superframes within the TDM signal” (Claims 41).

Second, the DTDM data transmission technique in Chao describes only an “assembler for combining diverse tributary data streams into a single DTDM stream” and a “disassembler for separating a DTDM bit stream into diverse tributary data streams” (Chao, col. 6, lines 20-25, and Figure 4-5). As such, Chao merely multiplexes packet data and TDM data into a DTDM signal, and performs the reverse operation through a demultiplexer. As such, Chao, either alone or in combination with the admitted prior art, does not describe the forwarding from a “packet engine unit” to a “framer unit” the “frames of TDM signal and the frame alignment data” (Claims 41). Therefore, Applicant respectfully submits that the combination does not describe or suggest Applicant’s independent Claim 41.

Applicant respectfully submits that dependent claims 42-46 are allowable for at least the reason that they depend on an independent allowable claim.

Invitation for a telephone interview

The Examiner is invited to call the undersigned at 408-720-8300 if there remains any issue with allowance of this case.

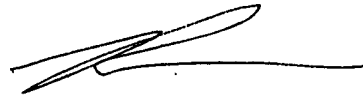
Charge our Deposit Account

Please charge any shortages and credit any overages to Deposit Account No. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: \_\_\_\_\_

7/21/07



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